



0000169996

INTERVENTION

MEETING AGENDA ITEM

4-27-16
Tuc off
JEC.

BEFORE THE ARIZONA CORPORATION COMMISSION

DOUG LITTLE, Chairman
BOB STUMP
BOB BURNS
TOM FORESE
ANDY TOBIN

RECEIVED
2016 APR 29 A 9:56

ORIGINAL AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION
OF TUCSON ELECTRIC POWER
COMPANY FOR THE ESTABLISHMENT
OF JUST AND REASONABLE RATES
AND CHARGES DESIGNED TO REALIZE
A REASONABLE RATE OF RETURN ON
THE FAIR VALUE OF THE PROPERTIES
OF TUCSON ELECTRIC POWER
COMPANY DEVOTED TO ITS
OPERATIONS THROUGHOUT THE
STATE OF ARIZONA AND FOR RELATED
APPROVALS

* Docket Nos. E-01933A- 15-
* 0322 AND 15-0329
* E-01933A 23
* MOTION FOR LEAVE
* TO INTERVENE OF
* BRUCE PLENK

Arizona Corporation Commission
DOCKETED

APR 29 2016

IN THE MATTER OF THE APPLICATION OF
TUCSON ELECTRIC POWER COMPANY FOR
APPROVAL OF ITS 2016 RENEWABLE ENERGY
STANDARD IMPLEMENTATION PLAN

DOCKETED BY

JEC

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), Bruce Plenk files this petition for leave to intervene in the above-captioned docket and, in support thereof, states as follows:

1. I am a resident of Tucson, Arizona, a current residential customer of Tucson Electric Power and a member of the Tucson-Pima County Metropolitan Energy Commission .
2. I have a direct interest in Tucson Electric Power's rate design proposals and its plans to expand its ownership of photovoltaic facilities and the impact these proposed changes may have on Tucson residents and the Tucson solar industry.
3. My address and other contact information are listed below.
4. I certify that a copy of this Motion to Intervene has been sent via email or regular mail to the attached service list on April 27, 2016.
5. I hereby consent to service by email for all future filings and orders in this matter and will file such consent with HearingDivisionServicebyEmail@azcc.gov

Respectfully submitted this 27th day of April, 2016.

47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97

BPL

Bruce Plenk
2958 N St Augustine Pl
Tucson, AZ 85712
Tel: 520 909-1389
Email: solarlawyeraz@gmail.com

98
99

SERVICE LIST:

<p>Michael W. Patten Jason D. Gellman Snell & Wilmer LLP One Arizona Center 400 East Van Buren Street Phoenix, AZ 85004 Attorneys for UNSE mpatten@swlaw.com bcarroll@tep.com jhoward@swlaw.com docket@swlaw.com Consented to Service by Email</p>	<p>Lawrence V. Robertson, Jr. P.O. BOX 1448 Tubac, AZ 85646 Attorney for Noble Solutions</p>
<p>Daniel W. Pozefsky, Chief Counsel RUCO 1110 West Washington, Suite 220 Phoenix, AZ 85007</p>	<p>Meghan H. Gravel Osborn Maledon, PA 2929 N. Central Ave., Suite 2100 Phoenix, AZ 85012 Attorneys for AIC mgrabel@omlaw.com Consented to Service by Email</p>
<p>Barbara LaWall, Pima County Attorney Charles Wesselhoft, Deputy County Attorney PIMA COUNTY ATTORNEYS OFFICE 32 North Stone Avenue, Suite 2100 Tucson, AZ 85701</p>	<p>Gary Yaquinto, President & CEO Arizona Investment Council 2100 N. Central Ave., Suite 210 Phoenix, AZ 85004 gyaquinto@arizonaic.org Consented to Service by Email</p>
<p>C. Webb Crockett Patrick J. Black FENNEMORE CRAIG, P.C. 2394 East Camelback Road, Suite 600 Phoenix, AZ 85016 Attorneys for Freeport and AECC wcrocket@fclaw.com pblack@fclaw.com Consented to Service by Email</p>	<p>Court S. Rich Rose Law Group PC 7144 E. Stetson Dr., Suite 300 Scottsdale, AZ 85251 Attorney for TASC & EFCA</p>
<p>Nicholas J. Enoch Jarrett J. Haskovek Emily A. Tornabene Lubin & Enoch, PC 349 North Fourth Avenue Phoenix, AZ 85003 Attorneys for IBEW Local 1116</p>	<p>Timothy M. Hogan Arizona Center for Law in the Public Interest 202 E. McDowell Road, Suite 153 Phoenix, AZ 85004 Attorney for Vote Solar, ACAA, WRA and SWEEP thogan@aclpi.org Consented to Service by Email</p>
<p>Briana Kobor/Vote Solar Program Director - DG Regulatory Policy 360 22nd Street, Suite 730 Oakland, CA 94612 briana@votesolar.org Consented to Service by Email</p>	<p>Rick Gilliam Director of Research and Analysis The Vote Solar Initiative 1120 Pearl Street, Suite 200 Boulder, CO 80302 rick@votesolar.org</p>

	Consented to Service by Email
Michael Hiatt Katie Dittelberger Staff Attorneys Earthjustice Rocky Mountain Office 633 7 th Street, Suite 1600 Denver, CO 80202 mhiatt@earthjustice.org kdittelberger@earthjustice.org Consented to Service by Email	
Craig A. Marks Craig A. Marks, PLC 10645 N Tatum Blvd. Suite 200-676 Phoenix, AZ 85028 Attorney for AURA Craig.Marks@azbar.org Consented to Service by Email	Steven W. Chriss Senior Manager, Energy Regulatory Analysis Wal-Mart Stores, Inc. 2011 S.E. 10th Street Bentonville, AR 72716-0550
Thomas A. Loquvam Pinnacle West Capital Corporation P.O. Box 53999, MS 8695 Phoenix, AZ 85072 Thomas.Loquvam@pinnaclewest.com Consented to Service by Email	Ken Wilson Western Resource Advocates 2260 Baseline Road, Suite 200 Boulder, CO 80302
Kerri A. Cames Arizona Public Service Company P.O. Box 53072, MS 9712 Phoenix, AZ 85072-3999 Kerri.Cames@aps.com Consented to Service by Email	Jeff Schlegel SWEEP Arizona Representative 1167 W. Samalayuca Dr. Tucson, AZ 85704-3224
Travis Ritchie Sierra Club Environmental Law Program 85 Second Street, 2nd Floor San Francisco, CA 94105 Travis.ritchie@sierraclub.org Consented to Service by Email	Ellen Zuckerman SWEEP Senior Association 1627 Oak View Ave. Kensington, CA 94707
Bryan Lovitt 3301 West Cinnamon Drive Tucson, AZ 85741	Cynthia Zwick , Executive Director Arizona Community Action Association 2700 N. 3rd St., Suite 3040 Phoenix, AZ 85004
Janice Alward, Chief Counsel Legal Division ARIZONA CORPORATION COMMISSION 1200 W. Washington Street Phoenix, Arizona 85007 rmitchell@azcc.gov wvancleve@azcc.gov cfitzsimmons@azcc.gov	Kevin Hengehold Energy Program Director Arizona Community Action Association 2700 N. 3rd St., Suite 3040 Phoenix, AZ 85004

